REMARKS

Claims 1-14 are pending in the above-referenced patent application. Claims 7-13 have been withdrawn from consideration, and Applicants reserve the right to file one or more divisional applications directed to these claims

Applicants acknowledge with appreciation the Examiner's indication that claims 4-5 and 14 contain allowable subject matter. Applicants submit that claims 1 and 3, from which claims 4-5 and 14 depend, respectively, are patentable over the cited prior art references. Applicants, thus, respectfully request that the Examiner allow claims 4-5 and 14.

Claims 1-3 and 6 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over U.S. Patent No. 6,519,242 to Emery et al. in view of U.S. Patent 6,577,637 to Sieppi. Applicants respectfully traverse the Examiner's rejection.

The Examiner relied upon Fig. 1 and its corresponding description in Emery et al. as alleged disclosure of the claimed features of registering an IP terminal device and connecting a gateway device to the IP terminal device through an IP network. Emery et al., as applied by the Examiner, describe a communication scheme for connecting calls between a Voice-over-IP ("VoIP") terminal device and a conventional telephone, which is connected to a Public Switched Telephone Network ("PSTN"). The Examiner acknowledged that Emery et al. do not "teach connecting a line switching exchanger and a network-gateway device by use of a radio-base-station-connection line that is used [for] connecting radio base stations," page 2, lines 20-22 of the Office Action, and relied upon Sieppi—Figs. 4a, 7a, and their corresponding description—as a combining reference that allegedly discloses this feature. Sieppi describe a system for reducing

audio data deterioration by avoiding unnecessary encoding/decoding processes when setting up a call from a radio mobile terminal device to a VoIP workstation.

As acknowledged by the Examiner, Emery et al. fail to teach connecting a line switching exchanger and a network-gateway device by use of a radio-base-station-connection line that is used for connecting radio base stations. The cited portions of Sieppi also do not teach this feature. As shown in Fig. 4a thereof, Sieppi describes a system where workstations are connected to a private branch exchange system ("PBX") whereby calls initiated at a mobile station (MS) may reach a workstation through either the Internet or a PSTN. The Examiner, in combining the references, stated that "it would have been obvious to one skilled in the art at the time the invention was made to modify the registration process disclosed by Emery to include a connection line to the PBX." Page 3, lines 3-5 of the Office Action. The Examiner further noted that Sieppi "shows a gateway exchange connected to a PBX ... and the operations are controlled by the Mobile station controller when a mobile unit wishes to initiate a call setup to a second subscriber station." Page 2, line 23 to Page 3, line 2 of the Office Action. But a call originating from a mobile station to a workstation via a PSTN (or the Internet) and a PBX still fails to disclose or suggest connecting a line-switching exchanger and a network-gateway using a radio-base-station-connection line that is used for connecting radio base stations. Accordingly, the Examiner's combination of references further fails to teach or suggest registering an IP terminal device as a radiotelephony device in the database of a line-switching exchanger.

Therefore, even assuming, arguendo, that it would have been obvious to combine the references, the combination would still fail to teach or suggest,

> "connecting said line-switching exchanger and a network-gateway device by use of a radio-base-station-connection line that is used for connecting radio base stations;

connecting said network-gateway device and said IP terminal device through an IP network; and
registering said IP terminal device as a radiotelephony device in said database," as recited in claim 1. (Emphasis added)

The claimed invention provides for treating, registering, and managing a VoIP terminal device as if it were a radio mobile terminal device that is connected to a radio-base-station-connection interface of a PBX. Advantageously, supplementary service functions of the PBX may be used, and a change in connection of the VoIP terminal device may be affected by simply changing the data registration to the PBX without requiring a change in the data registration to the gatekeeper device.

Applicants, thus, respectfully submit that claim 1, together with claim 2 dependent therefrom, is patentable over Emery et al. and Sieppi, individually and in combination, for at least the above-stated reasons. Claim 3 includes features similar to those of claim 1 cited above and is, therefore, together with claim 6 dependent therefrom, patentable over the cited prior art references for at least the same reasons.

The above statements on the disclosures in the cited references represent the present opinions of the undersigned attorney. The Examiner is respectfully requested to specifically indicate those portions of the respective reference that provide the basis for a view contrary to any of the above-stated opinions.

Applicants appreciate the Examiner's implicit finding that the additional U.S. patents made of record, but not applied, do not render the claims of the present application unpatentable, whether these references are considered alone or in combination with others.

In view of the remarks set forth above, this application is in condition for allowance which action is respectfully requested. However, if for any reason the Examiner should consider

this application not to be in condition for allowance, the Examiner is respectfully requested to telephone the undersigned attorney at the number listed below prior to issuing a further Action.

Any fee due with this paper may be charged to Deposit Account No. 50-1290.

Respectfully submitted,

Dexter T. Chang
Reg. No. 44,071

CUSTOMER NO.: 026304
Telephone No.: (212) 940-6384
Fax No.: (212) 940-8986/87
Docket No.: FUJI 18.144 (100794-11572)
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